

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

**Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:**

May 14, 2021

**Completion date for Phase I Discovery as agreed upon by the parties:**  
*(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)*

July 6, 2021

**Date for initial settlement conference:**

*(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)*

July 21, 2021

### Phase II (Discovery and Motion Practice)

**Motion to join new parties or amend the pleadings:**  
*(Presumptively 15 days post initial settlement conference)*

August 5, 2021

**First requests for production of documents and for interrogatories due by:**  
*(Presumptively 15 days post joining/amending)*

August 20, 2021

**All fact discovery completed by:**  
*(Presumptively 3.5 months post first requests for documents/interrogatories)*

December 15, 2021

**Exchange of expert reports completed by:**  
*(Presumptively 30 days post fact discovery)*

N/A

**Expert depositions completed by:**  
*(Presumptively 30 days post expert reports)*

N/A

**COMPLETION OF ALL DISCOVERY BY:**  
*(Presumptively 9 months after Initial Conference)*

December 15, 2021

**Final date to take first step in dispositive motion practice:**  
*(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)*

January 15, 2022

**Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?**

Yes